



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support
Bureau of Welfare Initiatives

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
FSET Administrative and Provider Agencies
Child Care Coordinators
W-2 Agencies**

BWI OPERATIONS MEMO

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PRIORITY: Medium

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Policy Analysis and Program Implementation Section**

**SUBJECT: TRANSPORTATION ASSISTANCE FOR W-2 PARTICIPANTS AND LOW
INCOME WORKERS**

CROSS REFERENCE: Wisconsin Works (W-2) Manual
Wisconsin Works Financial Management Manual
Request for Proposals to Administer Wisconsin Works
Section 49.157, Wis. Stats.
Wisconsin Administrative Rule, DWD 12.05

EFFECTIVE DATE: Immediately

BACKGROUND

Transportation is critical in the transition from welfare to work. In recognition of this, Wisconsin Works (W-2) Implementation Contracts include funding for transportation assistance. W-2 policy allows W-2 agencies to provide transportation for W-2 applicants and participants. Current policy does not, however, specify what types of assistance a W-2 applicant or participant is eligible for or how W-2 funds may be used.

There are many different sources of transportation funding geared toward the low income population. The Temporary Assistance for Needy Families (TANF) Employment Transportation Grant, for example, is a separate source of funding for transportation that may be at the disposal of the W-2 agency. This memo attempts to clarify different transportation funding options, and assist with transportation coordination at the local level.

FEDERAL DEFINITION OF ASSISTANCE

The U.S. Department of Health and Human Services defines "assistance" (in the **proposed** TANF rule) to mean every form of support provided to families under TANF except:

1. Services that have no direct monetary value to an individual family and do not involve implicit or explicit income support.

2. One-time, short-term assistance (e.g., automobile repair to retain employment).

Therefore, a participant who receives “assistance” (for example, a bus pass issued more than once in a twelve month period) is subject to all TANF requirements pertaining to the 60-month lifetime limit (the clock will “tick”) and other nonfinancial specifications such as cooperation with child support.

Families who are in a W-2 T, CSJ or Trial Job will not have their “clock tick twice” if they also receive transportation assistance during the same month.

Client Consultation

Thus, when providing transportation assistance to a person who is not currently having their clock “ticked” because of a W-2 Transition (W-2 T), Community Service Job (CSJ) or Trial Job placement, the W-2 Agencies must advise the family of this potential impact and weigh the cost of the “tick” against the benefit of the service before assistance is given.

Capacity Building & Group Transportation

If W-2 funds are used for capacity building or facilitating group transportation solutions, recipients of assistance of this type do not meet the federal definition of “assistance.” For example, someone who rides a TANF funded expanded bus route is not receiving “assistance” because the service does not have a direct monetary value to the individual family.

Record Keeping

For those persons who are currently in a W-2 component that does not affect the clock (for example, Case Management positions) and are receiving transportation assistance that should tick the clock, workers will be able to manually tick the clock in CARES pending programming changes expected in the Spring of 1999. Until then, workers should keep a manual tabulation of the months of assistance received and document these in case comments. Once CARES changes are implemented, workers will need to enter the manual information into the system. Instructions on how to enter manual clock ticks will be given at a later date.

TRANSPORTATION ASSISTANCE UNDER W-2

Section 49.141, Wis. Stats., and Administrative Rule DWD 12 define “participant” as an individual who participates in **any** component of the W-2 program. The Request for Proposals (RFP) to Administer W-2 defines applicant as an individual who applies for any component of the W-2 program. W-2 program components include:

1. Unsubsidized Employment (Case Management Positions)
2. Trial Jobs
3. Community Service Jobs
4. W-2 Transition Placements

Transportation assistance is available to applicants for and participants in W-2 components.

Under W-2, there are different eligibility criteria for different program components. Thus, eligibility criteria for transportation assistance parallels the eligibility criteria for that component in which the individual participates. The attached table summarizes the eligibility criteria and the types of assistance for each of the W-2 program components and for transportation available under Children First, Food Stamp Employment and Training (FSET), Child Care, TANF Employment Transportation Grant and Community Reinvestment.

If the W-2 agency wishes to provide transportation assistance using TANF funds to other persons receiving assistance through the W-2 agency, but who are not in a W-2 component (e.g., persons receiving assistance through the Employment Skills Advancement Program, Job Access Loan, etc.) the agency worker must place the person in a case management position to authorize transportation assistance.

TANF EMPLOYMENT TRANSPORTATION GRANTS

An additional (separate from the W-2 Implementation Contract) sum of funds for transportation services was enacted as part of 1997 Wisconsin Act 27. Requests for Proposals (RFPs) were sent out and awards made to operate the TANF Employment Transportation Program in 22 counties/tribes across the state.

The emphasis, although not sole purpose, of the TANF Employment Transportation Program is on capacity-building, not individual transportation solutions.

TANF Employment Transportation Program funds must be spent for the benefit of low income families whose income is below 165% Federal Poverty Level (FPL).

COMMUNITY REINVESTMENT

Some W-2 agencies also submitted plans for transportation initiatives using Community Reinvestment (CR) funding, which is also TANF funded. Therefore, families receiving services provided with CR funding are subject to TANF clocks if applicable. These agencies will be able to provide transportation assistance in varying forms for the benefit of families under 200% FPL.

CHILD CARE TRANSPORTATION

The nonfinancial and financial eligibility criteria for child care subsidies and child care transportation are the same. So, families who are eligible for child care subsidies are also eligible for transportation to and from child care providers. Families are not subject to any clock requirements when they are receiving child care subsidies. However, at this time we are trying to clarify whether or not child care transportation is a benefit that would tick each family's benefit clock. Until this issue has been clarified, agencies must manually track the number of months that each family receives child care transportation. Agencies will receive additional information when this issue is resolved.

GUIDELINES FOR USE OF W-2 FUNDS FOR TRANSPORTATION ASSISTANCE

W-2 agencies have considerable flexibility in using W-2 funds to provide transportation assistance. These general guidelines may be used in determining whether transportation assistance should be provided:

1. Assistance should be based on needs.

W-2 and W-2-funded programs are not entitlement programs. Transportation assistance should only be provided to eligible individuals/families who need assistance getting to and from work, child care and school.

2. If public transit services that meet the needs of the families are available, these services must be used.

The W-2 agency can help defray the costs of using public transportation through individual family reimbursement, passes or vouchers.

3. W-2 funds may be used for transit service infrastructure and capacity building, but cannot be used to purchase facilities or buildings (see examples).

4. The cost for transportation assistance must be allowable, reasonable, and necessary.

Refer to the W-2 Financial Management Manual for what is considered allowable, reasonable, and necessary.

5. The cost for transportation assistance must be allocated.

If W-2 funds are to be used for infrastructure or capacity building with another agency or program, the cost must be divided in accordance with the benefits received by each agency or program. See the W-2 Financial Management Manual for more details on cost allocation.

6. W-2 funds cannot be used to overcome a shortfall in another state or federally funded program.

W-2 funds cannot be used to remedy a deficit in another State or Federal transportation program.

SPECIFIC EXAMPLES

In addition to those examples specified in the **W-2 Manual** (18.6.0), here are other examples of ways in which W-2 and TANF funds can be utilized for transportation assistance to eligible individuals/families:

1. Reimbursement in whole or part to W-2 eligible individuals for work-related transportation expenses (e.g., mileage, gas, public transit fare, auto repairs/insurance, or a basic cash allowance for transportation needs).
2. A contract for shuttles, buses, car pools, shared ride taxis, or other transportation services for W-2 eligible individuals.
3. The purchase of vans/shuttles/minibuses for the provision of transportation services to W-2 eligible individuals.
4. The purchase of rider "slots," "passes," or vouchers on a public or private transit system.
5. Financial assistance in the form of loans to eligible individuals for the lease or purchase of a vehicle to travel to/from work, child care, etc.
6. Facilitating the donation and repair of previously owned or reconditioned vehicles to eligible families.
7. Payment of start up costs for new or expanded transportation services benefiting eligible families provided that such costs are necessary and reasonable, as well as allocated to cover only those costs associated with W-2 eligible individuals.
8. Provide training related to obtaining a loan for vehicle purchase, what to look for when buying a used car, drivers education, or maintenance and repair classes.
9. Group transportation solutions such as route expansions, extended bus hours, etc.

CONTACTS

BWI CARES and Policy Call Center: 608-261-6317.

ELIGIBILITY CRITERIA FOR TRANSPORTATION ASSISTANCE

Program/ Component	Financial Eligibility Criteria	Who Is Eligible?		What Types of Assistance?			Special Restrictions (if any)
		Applicant	Participa nt	To & From Child Care	To & From Work (Training)	To & From School	
Subsidized Employment Position (TJ, CSJ, W-2T)	115% FPL Assets at or below \$2,500	Yes <i>(only if required to participate in job search)</i>	Yes	Yes	Yes	Yes	
Learnfare		Not Applicable	Yes	Yes	Yes	Yes	Must be enrolled in school.
Unsubsidized Employment (CMF)	None	Not Applicable	Yes	Yes	Yes	Yes	If assistance meets the federal definition of "assistance" each month must tick the 60 month clock.
Unsubsidized Employment (CMS, CMU)	115% FPL Assets at or below \$2,500	No	Yes	Yes	Yes	Yes	If assistance meets the federal definition of "assistance" each month must tick the 60 month clock.
Child Care	165 % FPL initial, up to 200% FPL Assets at or below \$2,500	No	Yes	Yes	No	No	
Children First	None	No	Yes	No	Yes	No	Agencies are only reimbursed for costs up to \$25 per month.
FSET	Transportation available for all FSET participants	Yes	Yes	Yes	Yes	Yes	Agencies are only reimbursed for costs up to \$25 per month.
TANF Employment Grant	165% FPL or below	No	Yes	Yes	Yes	Yes	Only available in 22 counties/tribes. If assistance meets the federal definition of "assistance" each month must tick the 60 month clock.
Community Reinvestment	Up to 200% FPL	No	Yes	Yes	Yes	Yes	Only available in certain counties, must be part of the W-2 Agency plan. If assistance meets the federal definition of "assistance" each month must tick the 60 month clock.